

BRONSTEIN, GEWIRTZ & GROSSMAN, LLC

Neil Grossman, Esq.

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Attorneys for plaintiff, Earl Crumpe

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

EARL CRUMPE, individually and on
behalf of all others similarly situated,

PLAINTIFF,

v.

TD BANK, N.A.,

DEFENDANT.

Civil Action No.: 1:25-cv-01566
(RMB)(SAK)

NOTICE OF MOTION FOR
ADMISSION OF COUNSEL *PRO HAC*
VICE

MOTION DATE: APRIL 7, 2025

PLEASE TAKE NOTICE that on April 7, 2025, in the forenoon or as soon thereafter as counsel may be heard, plaintiff EARL CRUMPE shall move for a hearing before the Hon. Renee M. Bumb, United States District Court Judge, at the Mitchell H. Cohen Building and U.S. Court House, 4th & Cooper Streets, Camden, New Jersey 08101, for an order allowing PERETZ BRONSTEIN, ESQ. and MICHAEL BOYLE, ESQ., to be admitted to this Court *pro hac vice* for the purpose of representing the plaintiff in this matter.

Plaintiff shall rely upon the annexed Declarations of Peretz Bronstein, Michael Boyle and Neil Grossman. A proposed form of order is annexed hereto. No brief is submitted herewith as there is no issue of fact or law in dispute in connection with this motion.

BRONSTEIN, GEWIRTZ & GROSSMAN, LLC
Attorneys for plaintiff, Earl Crumpe

Dated: March 12, 2025

By: s/ Neil Grossman
Neil Grossman

BRONSTEIN, GEWIRTZ & GROSSMAN, LLC

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DISTRICT OF NEW JERSEY
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EARL CRUMPE, individually and on
behalf of all others similarly situated,

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TD BANK, N.A.,

DEFENDANT.

Civil Action No.: 1:25-cv-01566
(RMB)(SAK)

DECLARATION OF
NEIL GROSSMAN

MOTION DATE: APRIL 7, 2025

NEIL GROSSMAN, being duly sworn, declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of his information and belief.

1. I am an attorney admitted to practice law in this Court and in the courts of the State of New Jersey. I am a member of the firm of Bronstein, Gewirtz & Grossman, LLC, counsel in the within action for the plaintiff, EARL CRUMPE.

2. I make this Declaration in support of plaintiff's motion for an order pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey allowing Peretz Bronstein, Esq. and Michael J. Boyle, Esq. to appear in and to participate in this action *pro hac vice* as attorneys for the plaintiff. Neither Mr. Bronstein nor Mr. Boyle is otherwise eligible for admission to practice before the United States District Court for the District of New Jersey.

3. Mr. Bronstein is a member of the firm of Bronstein, Gewirtz & Grossman, LLC, with offices at 60 East 42nd Street, New York, New York 10165. He has set forth in his own Declaration his professional background and various bar admissions.

4. Mr. Boyle is Of Counsel to the firm of Bronstein, Gewirtz & Grossman, LLC, with offices at 60 East 42nd Street, New York, New York 10165. He has set forth in his own Declaration his professional background and various bar admissions.

5. I am not aware of any grievances or other disciplinary proceedings currently pending against either Mr. Bronstein or Mr. Boyle in any court, nor am I aware that either has ever been reprimanded, suspended, placed on inactive status, otherwise disciplined, or disbarred by any court or administrative body or resigned from the practice of law before any court.

6. It is my understanding that Mr. Bronstein does not reside in New Jersey, is not regularly employed in New Jersey, and is not regularly engaged in business, professional, or other similar activities in New Jersey.

7. It is my understanding that Mr. Boyle does not reside in New Jersey, is not regularly employed in New Jersey, and is not regularly engaged in business, professional, or other similar activities in New Jersey.

8. Mr. Bronstein is my partner and he and Mr. Boyle are my colleagues. Their admission *pro hac vice* will greatly assist my firm in its representation of the plaintiff.

9. I therefore respectfully request that the pending motion for an order permitting Messrs. Bronstein and Boyle to appear before this Court and to participate *pro hac vice* as attorneys for the plaintiff in this civil action be GRANTED.

Executed on March 12, 2025

s/ Neil Grossman
NEIL GROSSMAN

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

EARL CRUMPE, individually and on behalf of
all others similarly situated,

PLAINTIFF,

v.

TD BANK, N.A.,

DEFENDANT.

Civil Action No.: 1:25-cv-01566 (RMB)(SAK)

DECLARATION OF
PERETZ BRONSTEIN

PERETZ BRONSTEIN, being duly sworn, declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of his information and belief.

1. This Declaration is made in support of the motion made by Neil Grossman, a member of the bar of this Court and counsel in this action for the plaintiff, EARL CRUMPE, for an Order pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey granting me permission to appear and to participate *pro hac vice* as an attorney for the plaintiff in this action. I am not otherwise eligible for admission to practice before the United States District Court for the District of New Jersey.

2. I am a member of the firm of Bronstein, Gewirtz & Grossman, LLC, which has offices in New Jersey at 40 Calumet Avenue, Lake Hiawatha, New Jersey 07034 and in New York at 60 East 42nd Street, Suite 4600, New York, New York 10165.

3. I have been a member in good standing of the bar of all courts of New York State and have been eligible to practice in all such courts, including New York's highest court, the New York Court of Appeals, since 1986. Since 1990, I have also been a member in good standing of,

and eligible to practice before, the United States District Court for the Southern District of New York and the United States District Court for the Eastern District of New York.

4. I have read and am familiar with the Local Rules of the United States District Court for the District of New Jersey, the New Jersey Rules of Professional Conduct, and the Federal Rules of Civil Procedure.

5. There are no grievances or other disciplinary proceedings currently pending against me in any court.

6. I have never been reprimanded, suspended, placed on inactive status, otherwise disciplined, or disbarred by any court or administrative body, and I have never resigned from the practice of law before any court. I am not on the list of lawyers disqualified to appear before this Court.

7. I do not reside in New Jersey, I am not regularly employed in New Jersey, and I am not regularly engaged in business, professional or similar activities in New Jersey.

8. Since my admission to the New York bar in 1986, I have been in private practice, specializing in the field of commercial litigation.

9. I have previously worked with the movant, Neil Grossman, on numerous matters and have previously been admitted to the Superior Court of New Jersey and to this Court *pro hac vice* under Mr. Grossman's supervision and pursuant to his motion. Mr. Grossman and I have been law partners since July 2000.

10. I am admitted to and am in good standing with the New York Supreme Court, Second Appellate Department, which maintains a roll of the members of its bar and which has an address at 45 Monroe Place, Brooklyn, New York 11201.

11. I have been admitted to this Court *pro hac vice* with respect to a currently pending action, *Haley Williams v. Samsung Electronics America, Inc.*, Case No. 2:23-cv-00989 (EP) (JRA) and in that connection I have previously paid the NJ Lawyer's Fund for Client Protection's assessed fee for the calendar year 2025.

12. No previous application for the relief requested herein has been made.

13. I therefore respectfully request that the motion of Neil Grossman, a member of the bar of this Court, for permission for me to appear before this court and to participate *pro hac vice* as the attorney for the plaintiff be granted.

Executed on March 12, 2025

A handwritten signature in black ink, appearing to read 'Peretz Bronstein', written over a horizontal line.

Peretz Bronstein

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
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EARL CRUMPE, individually and on behalf of
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PLAINTIFF,

v.

TD BANK, N.A.,

DEFENDANT.

Civil Action No. 1:25-cv-01566 (RMB) (SAK)

DECLARATION OF
MICHAEL J. BOYLE

MICHAEL J. BOYLE, being duly sworn, declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of his information and belief.

1. This Declaration is made in support of the motion made by Neil Grossman, a member of the bar of this Court and counsel in this action for the plaintiff, EARL CRUMPE, for an Order pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey granting me permission to appear and to participate *pro hac vice* as an attorney for the plaintiff in this action. I am not otherwise eligible for admission to practice before the United States District Court for the District of New Jersey.

2. I am of counsel to the firm of Bronstein, Gewirtz & Grossman, LLC, which has offices in New Jersey at 40 Calumet Avenue, Lake Hiawatha, New Jersey 07034, in New York at 60 East 42nd Street, Suite 4600, New York, New York 10165, and in Columbus, Ohio at 4200 Regent Street, Suite 200, Columbus, Ohio 43219.

3. I am and have been a member in good standing of the bar of all courts of the State of California, including the highest court of that State, since 2008. The name and address of the

office maintaining the roll of the members of that bar is Attorney Services, The State Bar of California, 180 Howard Street, San Francisco, CA 94105.

4. I have been a member in good standing of the bar of all courts of the State of Ohio, including the highest court of that State, since 2014. The name and address of the office maintaining the roll of the members of that bar is Office of Attorney Services, Supreme Court of Ohio, 65 South Front Street, 5h Floor, Columbus, OH 43215-3431.

5. I have also been admitted and am eligible to practice in various federal courts, specifically, the United States District Courts for the Northern, Southern, Central and Eastern Districts of California, the Northern and Southern Districts of Ohio, the Central and Northern Districts of Illinois, the Eastern and Western Districts of Wisconsin, and the United States Courts of Appeals for the Sixth, Seventh and Ninth Circuits.

6. I have read and am familiar with the Local Rules of the United States District Court for the District of New Jersey, the New Jersey Rules of Professional Conduct, and the Federal Rules of Civil Procedure.

7. There are no grievances or other disciplinary proceedings currently pending against me in any court.

8. I have never been reprimanded, suspended, placed on inactive status, otherwise disciplined, or disbarred by any court or administrative body, and I have never resigned from the practice of law before any court. I am not on the list of lawyers disqualified to appear before this Court.

9. I do not reside in New Jersey, I am not regularly employed in New Jersey, and I am not regularly engaged in business, professional or similar activities in New Jersey.

10. Since my admission to the California bar in 2008, I have been in private practice, specializing in the field of commercial litigation, with the exception of the period from August 2011 through August 2012 when I clerked for the Honorable R. Guy Cole, Judge of the United States Court of Appeals for the Sixth Circuit.

11. I made an application to practice *pro hac vice* in this Court, which was approved, in the matter of *Pritchard v. Comenity Bank*, Case No. 2:15-cv-5994. That matter was closed on April 28, 2017.

12. I therefore respectfully request that the motion of Neil Grossman, a member of the bar of this Court, for permission for me to appear before this court and to participate *pro hac vice* as the attorney for the plaintiff be granted.

Executed on March 12, 2025


Michael J. Boyle

BRONSTEIN, GEWIRTZ & GROSSMAN, LLC

Neil Grossman, Esq.

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Attorneys for plaintiff, Earl Crumpe

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

EARL CRUMPE, individually and on
behalf of all others similarly situated,

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v.

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DEFENDANT.

Civil Action No.: 1:25-cv-01566
(RMB)(SAK)

ORDER
GRANTING ADMISSION OF
COUNSEL *PRO HAC VICE*

MOTION DATE: APRIL 7, 2025

THIS MATTER having come before this Court upon the motion of Neil Grossman, Esq., attorney for plaintiff EARL CRUMPE, to have Peretz Bronstein, Esq. and Michael J. Boyle, Esq. admitted *pro hac vice* in this case in order to represent the plaintiff, and notice having been given to counsel for all parties appearing in this action; and the Court having reviewed the Declarations submitted by Mr. Grossman, Mr. Bronstein and Mr. Boyle, and there being no opposition to the motion; and for good cause shown;

IT IS on this _____ day of _____, 2025

ORDERED, that PERETZ BRONSTEIN, ESQ. of the Bar of the State of New York and

MICHAEL J. BOYLE, ESQ. of the Bars of the States of Ohio and California are hereby admitted to this Court *pro hac vice* in order to participate in the above-captioned case as plaintiffs' counsel pursuant to Rule 101.1(c) of the Local Civil Rules of the United States District Court for the District of New Jersey; provided, however, that all pleadings, briefs and other papers filed with the Court shall be signed by Neil Grossman, Esq., attorney of record, who shall be held responsible for said papers and for the conduct of the cause and who shall be present before the Court during all steps of this proceeding unless expressly excused by the Court, and who shall be held responsible for the conduct of the admitted attorney herein; and it is

FURTHER ORDERED, that each and both of Peretz Bronstein, Esq. and Michael Boyle, Esq. shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order; and it is

FURTHER ORDERED, that Peretz Bronstein, Esq. and Michael Boyle, Esq. shall be bound by the Local Civil Rules of the United States District Court for the District of New Jersey; and it is

FURTHER ORDERED that a copy of this Order shall be served upon all counsel of record within ten (10) days of the date hereof.

SO ORDERED,
